

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In Re: Marie Carver Meadows
Debtor.

Case No. 3:bk-12-32228-KRH
Chapter 13

NOTICE OF MOTION TO EMPLOY

Mitchell P. Goldstein, Esq., special counsel for the Debtor, has filed a Motion to be Employed as Special Counsel.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully, and discuss them with your attorney in this Bankruptcy Case, if you have one. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before May 25, 2012, you or your attorney must:

File with the court. at the address shown below, a written response, pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response, to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

And also:

Clerk US Bankruptcy Court
701 E. Broad St., Suite 4000
Richmond. VA 23219

Mitchell P. Goldstein, Esq.
9962 Brook Road, #647
Glen Allen, VA 23059

Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion, and may enter an order granting that relief.

/s/Mitchell P. Goldstein
Mitchell P. Goldstein, Esq. VSBN 40613
mitch@mitchellpgoldstein.com
Goldstein Law Group
9962 Brook Road, #647
Glen Allen, VA 23059
(804) 592-1674

CERTIFICATE OF SERVICE

I certify that I have transmitted a true copy of the foregoing application electronically through the Court's CM/ECF system or by mail to the Debtor(s), Chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1(d)(3), and to all parties in interest.

/s/ Mitchell P. Goldstein
Mitchell P. Goldstein, Esq.

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CONSENT MOTION TO EMPLOY SPECIAL COUNSEL

Comes now the Movant, by counsel, and respectfully represent as follows:

1. This court has jurisdiction pursuant to 28 USC §1331 and this is a core proceeding pursuant to 28 USC §157.
2. Movant filed bankruptcy in this court on April 6, 2012, case number 12-32228-KRH. Rudolph C. McCollum, Jr., is, and will remain, Movant's counsel of record in the Chapter 13.
3. Movant wishes to employ special counsel to prosecute a complaint to determine the extent of a secured creditor's allowed secured claim on Movant's real estate.
4. Counsel has agreed to represent the Movant if the court approves this employment.
5. Counsel is to be paid through the Chapter 13 plan upon approval by the Court of a Supplemental Fee Application to be submitted upon completion of the Adversary Proceeding anticipated by this Motion.
6. Movant has paid \$500 to be held in escrow to cover necessary costs resulting from this Adversary Proceeding.

WHEREFORE, the Movant respectfully requests that this court approve employment of Mitchell P. Goldstein, Esq. as special counsel to the Movant for purpose of filing an adversary proceeding to determine the extent of a secured creditor's allowed secured claim on Movant's real estate.

May 11, 2012

Marie Carver Meadows

/s/ Mitchell P. Goldstein, Esq.
AP Counsel for Movant

We ask for this:

/s/ Mitchell P. Goldstein, Esq.
Mitchell P. Goldstein, Esq., VSB 40613
mitch@mitchellpgoldstein.com
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9962 Brook Road, #647
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/s/ Rudolph C. McCollum, Jr. (authorized by email)
Rudolph C. McCollum, Jr. VSB#32825
McCollum At Law, P.C.
P.O. Box 4595
Richmond, VA 23220
Email: rudy@mccollumatlaw.com
(804) 523-3900 Fax: (804) 523-3901

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2012, a true and correct copy of the foregoing Consent Motion to Employ was submitted for electronic transmittal to the U.S. Trustee; Chapter 13 Trustee; and Rudolph C. McCollum, Jr.; and by electronic mail to the Debtor/Movant.

/s/ Mitchell P. Goldstein, Esq.
Mitchell P. Goldstein, Esq. 40613